

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
Lawrence W. Luttrell, Esq. Law Offices of Lawrence W. Luttrell, P.C. 2137 State Route 35, 3 rd Floor Holmdel, New Jersey T: 732-872-6900 F: 888-655-7393 <i>Attorneys for Debtor</i>	CASE NO.: 17-30733-MBK CHAPTER 13 HEARING DATE: November 8, 2017 JUDGE: Michael B. Kaplan
In Re: ALEXANDER STAVITSKIE, III Debtor.	

**CERTIFICATION IN OPPOSITION TO
ORDER TO SHOW CAUSE TO DISMISS BANKRUPTCY CASE**

Lawrence Luttrell, hereby certifies as follows:

1. I am the attorney for the debtor in the above-captioned matter and am personally aware of the facts set forth in this Certification.
2. I make this Certification in opposition to the order to show cause to dismiss the case.
3. On October 13, 2017, the Court initiated an order to show cause to dismiss the case because the debtor had not filed the chapter 13 plan or a request for an extension.
4. The debtor's plan is to repay the outstanding tax liability owed to the IRS. However, the plan could not be timely filed because the IRS had not provided information necessary as to the amount and tax years owed. The request for an extension should have been filed, but was not because the IRS advised my office staff that the requested figures were forthcoming.
5. The IRS finally filed a proof of claim with the tax information on October 30, 2017.
6. In turn, the debtor's plan was filed on October 30, 2017.

7. Accordingly, it is respectfully request that the Order to show cause be dismissed or withdrawn as moot.
8. I certify that the above statements made by me are true. I am aware that if any of the above statements made by me are true that I am subject to punishment.

October 30, 2017

s/Lawrence W. Luttrell

Lawrence W. Luttrell